

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA DIVISION**

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**IN RE:**

**STEPHEN W MCGANN,  
Debtor**

**NewRez LLC d/b/a Shellpoint Mortgage  
Servicing  
Movant**

**Stephen W. McGann  
Debtor/Respondent**

**Kenneth E. West, Esquire  
Trustee/Respondent**

**CASE NO.: 20-13814-mdc**

**CHAPTER 13**

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**MOTION TO APPROVE LOAN MODIFICATION**

Movant, NewRez LLC d/b/a Shellpoint Mortgage Servicing (“Creditor”), by and through its undersigned counsel, files this Motion to Approve Loan Modification, as set forth below:

1. The Debtor(s), Stephen W. McGann (“Debtor(s)”), filed a Chapter 13 Petition for Relief on September 23, 2020.
2. Debtor(s) is/are the owner of the property located at 1609 W Lincoln Hwy, Langhorne, PA 19047, (the “Property”).
3. Creditor holds a valid lien on the Property by way of a Mortgage in the original principal amount of \$129,731.00, which was recorded on May 1, 2019 in Bucks County.
4. Debtor and Creditor have entered into a Loan Modification Agreement (the “Agreement”). The Agreement is attached hereto as Exhibit “A.”
5. Pursuant to the Agreement, final approval is contingent upon the Bankruptcy’s Court approval of the Agreement.

6. Creditor seeks Court approval by way of the within Motion, including an Order stating that approval and recordation (if applicable) of the Loan Modification shall not constitute a violation of the automatic stay.
7. No parties will be prejudiced by approval of this agreement, as it will only benefit both Debtor and Creditor.

**WHEREFORE**, Secured Creditor, NewRez LLC d/b/a Shellpoint Mortgage Servicing, respectfully requests this Honorable Court enter an Order Granting the Motion to Approve Loan Modification, and for any such further relief as this Honorable Court deems just and proper.

Date: January 7, 2022

Respectfully Submitted,

**Robertson, Anschutz, Schneid, Crane & Partners PLLC**  
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